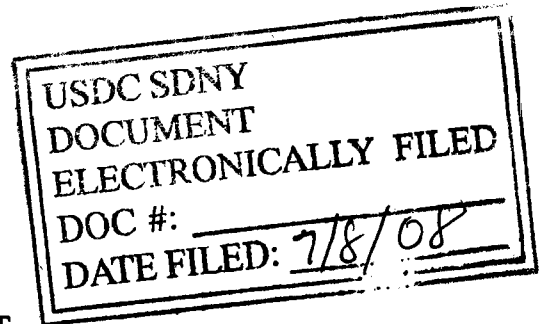




THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

MICHAEL A. CARDOZO
Corporation Counsel

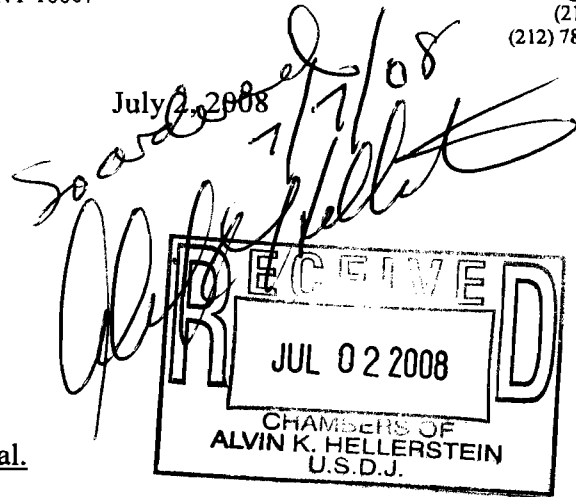


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The Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Peal Street
New York, New York 10007

Re: Bunce v. City of New York et al.
08 Civ. 04857(AKH)



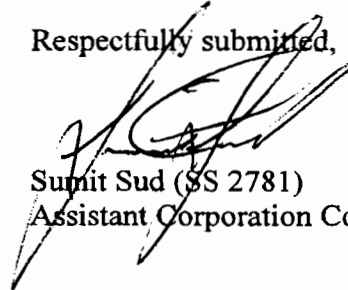
Your Honor,

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department and the attorney assigned to the above-referenced matter. I write to respectfully request that defendant City of New York be granted an enlargement of time from the present date until September 2, 2008, to answer or otherwise respond to plaintiff's complaint. Plaintiff's counsel Nkeruwem Umoh, Esq., consents to this request. This is defendant City's first request for an enlargement of time to answer.

There are several reasons for seeking an enlargement of time. In accordance with this office's obligation under Rule 11 of the Federal Rules of Civil Procedure, we need time to investigate the allegations of the complaint. Plaintiff alleges that, on or about October 8, 2007, he was falsely arrested and physically assaulted during the course of that arrest by three members of the New York City Police Department. To that end, this office is in the process of forwarding to plaintiff for execution an N.Y.C.P.L. §160.50 release so that we can access the sealed records from plaintiff's underlying criminal prosecution, including the Criminal Court file, the District Attorney's file, and even our own police records. To the extent that plaintiff is alleging that he sustained physical injuries as a result of the alleged incident, this office is also in the process of forwarding a HIPPA compliant medical release to plaintiff.

Accordingly, defendant City of New York respectfully requests that its time to respond to the complaint be extended until September 2, 2008. Thank you for your consideration of this request.

Respectfully submitted,



Summit Sud (SS 2781)
Assistant Corporation Counsel

cc: Nkereuwem Umoh, Esq.
Plaintiffs Counsel (By Fax)